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May 29, 2024

Via ECF

The Hon. Naomi Reice Buchwald
 Daniel Patrick Moynihan
 United States Courthouse
 500 Pearl St.
 New York, NY 10007-1312

Re: LoanStreet Inc. and Ian Lampl v. Wyatt Troia, Case No. 21-cv-06166-NRB

Dear Judge Buchwald:

I am writing to request a very limited extension of fact discovery in the above-captioned matter and to report regarding the potential for mediation, as discussed at the status conference on May 23, 2024.

As the Court is aware, the depositions of Mr. Lampl and Mr. Troia were to occur this week. However, the wife of a friend of Mr. Toossi passed away last weekend after a bout with cancer, and her funeral has been scheduled for this Friday, May 31, which was the date of Mr. Lampl's deposition. We reached out to Mr. Troia's counsel and they agreed to delay Mr. Lampl's deposition to next week so that Mr. Toossi could attend the funeral. In accommodation for their courtesy, we have also agreed to postpone Mr. Troia's deposition, which was scheduled for May 30, until next week as well. Accordingly, the parties respectfully request that the Court allow a limited extension of the discovery period, until June 7, 2024, to permit the parties to complete the depositions of Mr. Lampl and Mr. Troia.

Separately, at the conference on May 23, 2024, the Court asked Mr. Troia's counsel to confer with his client and determine whether he was amenable to mediation in this case. Mr. Troia's counsel has advised us that their client declines to participate in mediation. Thus, the Plaintiffs respectfully request that the Court schedule a telephone conference to discuss a trial date for this matter.

Respectfully submitted,

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